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8 UNITED STATES DISTRICT COURT  
9 WESTERN DISTRICT OF WASHINGTON

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11 UNITED BROTHERHOOD OF  
12 CARPENTERS AND JOINERS OF  
13 AMERICA, an unincorporated  
14 association, and PACIFIC  
15 NORTHWEST REGIONAL  
16 COUNCIL OF CARPENTERS, an  
unincorporated association,

17 Plaintiff[sic],

18 v.

19 EVELYN SHAPIRO, an individual,

20 Defendant.  
21  
22

Case No.: 2:22-cv-00245-TSZ

DECLARATION OF JUAN SANCHEZ

23 I, JUAN SANCHEZ, make the following statement under oath subject to penalty of  
24 perjury under the laws of the United States and the State of Washington:

25 1.1 My name is JUAN SANCHEZ. I am over the age of eighteen and am competent to  
26 testify in these proceedings. My testimony is based upon my personal knowledge, and my  
27 education, training, and experience. I started working in 2005 as an apprentice in construction.  
28 Prior to that, I worked from 2003- 2005 as a non-union carpenter. I have a general education  
29 diploma.  
30  
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32 Declaration of Juan Sanchez

33 - 1 of 5

ECF Case No. 2:22-cv-00245-TSZ

1.2 In September of 2007, I began working for the Pacific Northwest Regional Council of Carpenters as a Representative. In that position, I would visit job sites and receive phone calls from members. I would assist them in interpreting the collective bargaining agreements. I organized at construction companies.

1.3 In 2021 prior to late October, Evelyn Shapiro Executive Secretary/Treasurer of the Council disclosed at a Director meeting that a member vote on a tentative collective bargaining agreement for Western Washington had discrepancies consistent with tampering. She indicated that any suspect votes should not be considered. I understood from the meeting that UBC was aware of the problem and had instructed Shapiro to deal with it. This was the first time I became aware of vote tampering as an issue. I had not been asked to tamper with votes. I had not tampered with votes.

1.4 Later in October 2021, Dan Shanley brought me into a meeting with Mike McCarron, Mike Kwiatkowski, Anthony Peña, Miguel Avitia, and another man I did not recognize. The first thing Dan Shanley said to me was to the effect of “Juan, you are very well respected, but you are being accused of voter fraud.” He said Dan Hutchins confessed that he committed voter fraud in the past and that I should confess to the same.

1.5 I was shocked and disappointed.

1.6 I had nothing to do with any vote tampering or voting fraud.

1.7 I suspected what was going on was the national organization, United Brotherhood of Carpenters (“UBC”), wanted to take over local control and they were setting me up to be their scapegoat.

1.8 The reason I believe that was what Mr. Shanley and Mr. McCarron were trying to do was that I knew they had been pressuring Ms. Shapiro to give them control of the Council. I

1 understood that Mr. McCarron had wanted to sign the negotiated agreement or have Ms. Shapiro  
2 sign without a vote of the membership. I understood that they were not supportive of staff  
3 organizing to be represented at the regional level. I understood they were trying to justify a  
4 trusteeship where they would have all the power.  
5

6 1.9 Before leaving that meeting, Mr. Shanley made sure I no longer had my work phone or  
7 any other identification badges or equipment to continue working. At that point, Shanley told  
8 me that I was placed on administrative leave.  
9

10 1.10 By October 29, 2021, I received a paystub and paycheck in the mail, this was very  
11 unusual because I have direct deposit and this check included part of my vacation time, at that  
12 time I thought I no longer had a job.  
13

14 1.11 I have read Attorney Shanley's unverified Complaint in case No. 2:22-cv-00245-JHC  
15 filed 3-2-22.  
16

17 1.12 At Dkt. 1 page 10 paragraph 55 references me by name and title "Director of  
18 Organizing." I am the Juan Sanchez referenced in the Complaint.  
19

20 1.13 Paragraph 57 contains the following false statement: "Shapiro ordered Sanchez to fix the  
21 vote." Evelyn Shapiro NEVER ordered me to fix any vote. Ms. Shapiro did not order me ever  
22 to vote yes in favor of any tentative agreement for members who had not yet voted. I did not fix  
23 any votes ever.  
24

25 1.14 Paragraph 58 contains a false statement that I "did as ordered and voted yes in favor of  
26 TA#4 for members who had not yet voted." There was no such order. I did not vote yes in favor  
27 of TA#4 for members who had not yet voted. The entire paragraph contains blatantly false  
28 statements that have zero basis in fact.  
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1 1.15 Paragraph 61 contains the false statement that I had members' ID numbers that allowed  
2 me to sign in and vote for members who had not yet voted. I did not have members' ID numbers  
3 to engage in vote rigging. I did not cast votes for members who had not yet voted. I did not vote  
4 for TA#3 for anyone else or for any fictional voter.  
5

6 1.16 With regard to paragraph 81 and 82, any "suspect" Vancouver, WA IP address is not me.  
7 I do not live in Vancouver, WA. I have not used any devices to cast false votes. With regard to  
8 paragraph #83, I did not use my UBC ID number to cast false votes.  
9

10 1.17 With regard to paragraph 88, the allegation that Evelyn Shapiro and I texted with one  
11 another "to fix the vote" is untrue and a complete fabrication. There were never any such texts.  
12

13 1.18 With regard to paragraphs 89 to 91, the representations are simply untrue.

14 1.19 I believe Dan Shanley and the UBC have published false statements against me to fit  
15 their narrative to justify taking over control of the Council because we ran the Council from the  
16 bottom up, member input and control, and tried to be independent from the UBC.  
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18 DATED this 5th day of May, 2022 at Camas, WA.  
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22 Juan Sanchez  
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CERTIFICATE OF SERVICE

I, Bayley Briscoe, hereby certify as follows:

I am over the age of 18, a resident of Pierce County, and not a party to the above action. On May 5, 2022, I electronically filed the above JUAN SANCHEZ DECLARATION, with the Clerk of the Court using the Pacer CM/ECF e-filing system which will send notification of such filing to all counsel of record who receives CM/ECF notification.

I certify under penalty of perjury under the laws of the State of Washington that the above information is true and correct.

DATED this 5th day of May, 2022 at Fircrest, Washington.



Bayley Briscoe, Legal Assistant